## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEBRASKA

IN THE MATTER OF:

THE GREAT PLATTE RIVER ROAD MEMORIAL FOUNDATION, LLC

Debtor.

CASE NO. 13-40411 TLS CHAPTER 11

MOTION FOR ORDER ENTERING FINAL DECREE

AND NOTICE OF RESISTANCE DEADLINE

DEBTOR herein, The Great Platte River Road Memorial Foundation, LLC, respectfully requests that the court enter a final decree pursuant to Rule 3022 of the Federal Rules of Bankruptcy Procedure and 11 U.S.C. §350(a), closing the case.

In support of this Motion, Debtor shows the court that its Plan of Reorganization (the "Plan") was confirmed pursuant to an order of this court dated September 18, 2013. Under the Plan, the Debtor committed to pay \$50,000 to Class I creditors (the bondholders) and \$50,000 to Class II creditors (unsecured creditors), and to pay certain priority and administrative claims. It has timely made those payments. It continues to make other payments called for under the Plan. There are no unresolved adversary proceedings or motions in the case. The Debtor believes that although the Debtor remains obligated on certain plan obligations, the case is nevertheless fully administered within the meaning of 11 U.S.C. §350(a).

Therefore it is necessary and appropriate that the court enter a final decree closing the case.

WHEREFORE, Debtor requests that the court enter a final decree closing this case.

Dated this 24 th day of December, 2013.

The Great Platte River Road Memorial Foundation, LLC, Debtor

By: s/T. Randall Wright

T. Randall Wright (#16398)

of BAIRD HOLM LLP

1500 Woodmen Tower

1700 Farnam St

Omaha, Nebraska 68102-2068

Telephone: 402-344-0500 Facsimile: 402-231-8556 rwright@bairdholm.com

## NOTICE OF OBJECTION/RESISTANCE DEADLINE

## TO ALL PARTIES IN INTEREST:

YOU ARE HEREBY NOTIFIED that the last day to object to or resist the foregoing Motion filed by Baird Holm LLP, attorneys for the Debtor, is January 15, 2014. If a timely resistance or request for hearing is filed and served, the Clerk shall schedule a hearing. If the resistance period expires without the filing of any resistance or request for hearing, the Court will consider entering an order granting the Application without further notice or hearing.

## **CERTIFICATE OF SERVICE**

I hereby certify that on December 24, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Patricia Fahey ustpregion13.om.ecf@usdoj.gov

Robert M. Gonderinger rgonderinger@crokerlaw.com

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and I hereby do certify that I have mailed the filing by United States Postal Service, to the non-CM/ECF participants on the attached list.

By: s/T. Randall Wright

DOCS/1230093.1

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Label Matrix for local noticing 0867-4 Case 13-40411-TLS District of Nebraska Lincoln Office Mon Dec 23 16:37:59 CST 2013

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Kearney, NE 68847-0462

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Kearney, NE 68847-7480

Kearney, NE 68848-1270

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PO Box 1270

Assurant Health PO Box 790293

St. Louis, MO 63179-0293

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Mill Valley, CA 94941-5081

Holdrege, NE 68949-0558

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Kearney, NE 68848-1895

PO Box 1895

Cedar Ridge Emu Products PO Box 132

Hadar, NE 68738-0132

Chubb & Son PO Box 382001 Pittsburgh, PA 15250-8001

Comfy Bowl Inc Portable Rest Rooms PO Box 274 Gibbon, NE 68840-0274

D Jean Smith 74460 Road 395 Curtis, NE 69025-6118

Diamond Willow Nebraska 2522 16th St Columbus, NE 68601-4302 Buffalo County Sheriff's Office

Alarm Service Billing

PO Box 2228

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Centralized Insolvency Operations Internal Revenue Service PO Box 7346 Philadelphia, PA 19101-7346

City of Kearney Utilities Department PO Box 1180 Kearney, NE 68848-1180

CornCoctions 17901 W Cedarview Rd Wood River, NE 68883-9351

Deluxe for Business PO Box 742572 Cincinnati, OH 45274-2572

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Page 5 of 7 Gary Decking nts PO Box 11 Cambridge, NE 69022-0011

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Great Plains Sound & Technology, LLC PO Box 14759 Augusta, GA 30919-0759

Heirloom Treasures 85463 563 Ave Winside, NE 68790-5090 High Plains Wheat Weaver Box 383 Potter, NE 69156-0383

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Attn: Kathy Conway 524 S Osage St Independence, MO 64050-3824

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State of Nebraska Department of Roads PO Box 94759 Lincoln, NE 68509-4759

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The Hartford PO Box 660916 Dallas, TX 75266-0916 Tony's Snow Service 3850 Dove Hill Ave Kearney, NE 68845-0405

Tractor Supply Credit Plan Dept 30 1102789573 PO Box 689020 Des Moines, IA 50368-9020

Tyco Integrated Security LLC PO Box 371967 Pittsburgh, PA 15250-7967

United States Trustee 111 S 18 Plaza, Ste 1148 Omaha, NE 68102-1321

UnitedHealthcare Insurance Company Dept CH 10151 Palatine, IL 60055-0151

Warren-T Plumbing Services 1400 W 22 St Ste A Kearney, NE 68845-5385

Wells Fargo Bank Special Accounts Group MAC N9303-110 Sixth St and Marquette Ave Minneapolis, MN 55479-0001 Wells Fargo Bank NA, as Indenture Bond Trust c/o Robert M. Gonderinger Croker Huck Kasher DeWitt Anderson & Gon 2120 South 72nd Street, Suite 1200 Omaha, NE 68124-2366

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Frontier PO Box 20550 Rochester, NY 14602-0550 (d)Frontier Communications Bankruptcy Dept 19 John St Middletown, NY 10940

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u) Wells Fargo Bank, National Association

End of Label Matrix
Mailable recipients 102
Bypassed recipients 1
Total 103